

HOWE CENTER

1 Scale Avenue
Rutland, Vermont 05701
802-773-5711

Corporate Offices:
Howe Center Ltd.
140 Granger Street
Rutland, Vermont 05701
802-773-6251



SEMS DocID 623530

August 9, 1998

Mr. Donald Smith (Mail Code: HBS)
Site Assessment Manager
U.S. EPA Region I
Superfund Support Section
John F. Kennedy Federal Building
Boston, MA 02203-0001

Subject: Comments to Draft Site Inspection Report
Howe Richardson Scale Co. (former)
Rutland, Vermont
CERCLIS No. VTD002078509
TDD No. 98-05-0035

Dear Mr. Smith:

We are writing to provide comments to the Draft Site Inspection (SI) Report prepared for the Howe Richardson Scale Co. (former) property located in Rutland, Vermont, prepared by Roy F. Weston, Inc. and dated July 21, 1998.

Our comments are as follows:

1. On page 1 of the report in the first paragraph, the property location is incorrectly identified as 20 Cummings Avenue. The correct address is 1 Scale Avenue, Rutland, Vermont. The address is also incorrectly listed in the "Site Description" section as 26 Strongs Avenue. This item should also be corrected to read "1 Scale Avenue".
2. The property is not bordered by residences located at Porter Place to the south as described in the "Site Description" section, page 1. Moulthrop Avenue extends along the majority of the southern property border. The remainder of the property abuts Moon Brook and a residence located on Park Street.
3. Howe Center Ltd. (HCL) acts as the sole operator and leasing agent for the property. HCL is also responsible for all property management. Giancola
◀ Center for Commercial, Educational, Industrial & Business ▶

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Construction Corp. is a general contractor retained by HCL to perform maintenance, repair and renovation activities at the site. Giancola Construction Corp. has no formal contract to "operate" the site.

4. Hank's Auto Repair has closed and vacated Building 16. All drums stored within the building were removed by the tenant. This building has recently been leased to another repair shop. However, prior to turning over the building, both the floor drain and outlet pipe were closed in place using cement grout. HCL was not aware of the existence of this floor drain until the START on-site reconnaissance. The floor drain is not allowed according to Vermont Underground Injection Control regulations and it was closed. We will be contacting Mr. Charles Schwer of the Vermont Department of Environmental Conservation regarding the stained area identified in the Draft SI report. We anticipate that we will work with the VTDEC to remove soil in the stained area. It is likely that the soils will be poly-encapsulated on site in a secure area. The removal of these soils will be documented and reported to VTDEC.
5. We have several modifications to Table 1 listed on page 6, as follows:
 - a. Bldg. 2 - actually Atomic Pro Audio Productions
 - b. Bldg. 7 - currently leased to Fastenal, Retail/Wholesale Sales
 - c. Bldg. 11 - should be Jerry LeBlonde - Photiques, offices
 - d. Bldg. 16 - currently leased to Mighty Muffler, Auto Repair
6. On page 12, paragraph number 3: the Countryside Estates water system has been discontinued. Each property in Countryside Estates is served by an individual on-site drinking water well.
7. On page 14, paragraph 2 mentions a "recovery well" that was installed on site. It should be noted that this recovery well does not presently exist on site.
8. On Page 18 it should be noted that the effluent pipe leading from Building 16 has been plugged. Information on the depth of contamination in this area will be

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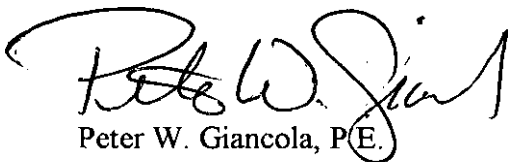
provided to VTDEC after it has been excavated.

9. Page 21, paragraph 1 should be corrected to remove the references to Porter Place residences bordering the site.
10. Page 21, paragraph 2, should remove the reference to Giancola Construction Corp. as the operator of the site.
11. Page 22, paragraph 2, should be corrected to reflect the current status of Building No: 16.

We hope this information is helpful during the review process for this site. As always, should there be any questions, please do not hesitate to contact me at 802-773-6251.

Very truly yours,

HOWE CENTER LTD.



Peter W. Giancola, P.E.
Vice President
Environmental Compliance & Engineering

cc: Mr. Steven Znamierowski, ATC Environmental

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